

November 22, 2011

SENT VIA EMAIL

Ms. Rebecca Pearce
Executive Director
Maryland Health Benefit Exchange
4201 Patterson Avenue
Baltimore, MD 21215

**RE: Maryland Health Benefit Exchange
Public Comment – Advisory Committees**

Dear Ms. Pearce:

Thank you for the opportunity to comment on the policy decisions before the Maryland Health Benefit Exchange. Please note that as a member of the Alliance of Maryland Dental Plans, we concur in their comments, which are being submitted under separate cover. However, we are writing to raise two additional important issues in regard to Maryland's continuing efforts to establish a health insurance exchange in accordance with the Affordable Care Act (ACA).

First, the ACA requires state exchanges to allow consumers the choice to purchase mandated pediatric dental benefits from a participating, qualified stand-alone dental benefits provider. For Maryland consumers in the exchange to have true choice and cost transparency, dental plan options in the exchange will need to be priced and offered separately from medical plans. This means Qualified Health Plans in the exchange should be required to offer and price a medical-only option in addition to any bundled benefits program they might want to offer. Maryland residents will then be free to couple the dental plan that best meets their needs with the medical plan that does the same. Many will want to choose the dental plan that includes their existing family dentist, and the exchange should allow this.

Second, a key promise behind the ACA, as emphasized by the President, is that "everyone who wants to may keep their current health plan." The President has also reassured consumers that "if you like your doctor, you may keep your doctor." In order for the Exchanges to fulfill this promise, there must be consideration for families that already have separate dental policies that satisfy the pediatric essential dental benefit requirements. Therefore, just as separate dental plans offered in the exchanges can be joined with medical policies in the exchanges to meet the Essential Health Benefits Package (EHBP), we urge you to clarify that separate dental policies offered *outside* of the exchanges can be paired with medical policies in the exchanges to meet the EHBP. Again, this will ensure that consumers can keep their existing family dentist by not having to switch networks, and that families are not forced to duplicate pediatric coverage they already have and/or drop their family dental coverage. This risk is particularly real for employees of small groups who obtain their medical coverage through the SHOP exchange, but have employer-sponsored family dental coverage outside

of the exchange, since a National Association of Dental Plans study found that approximately 69% of small groups expect to continue such coverage after the exchanges are launched. This clarification would allow the Maryland Health Benefit Exchange to expand coverage without disrupting families' current benefits and continuity of care.

We would be happy to meet with you and/or any appropriate staff to discuss this matter further. We know the task of implementing an insurance exchange that promotes competition, offers a user-friendly shopping experience and, in the end, promotes access to care is challenging. Please know that we are committed to providing quality dental coverage to consumers in Maryland and support the creation of a stable and competitive Exchange marketplace.

If you have any questions, please do not hesitate to call me at (415) 972-8418.

Sincerely,



Jeffrey M. Album
Vice President, Public & Government Affairs

cc: Dr. Joshua Sharfstein